

Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • emanuel@sagelegal.nyc

February 10, 2026

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. James R. Cho, U.S.M.J.
225 Cadman Plaza East, Courtroom 11D
Brooklyn, NY 11201-1804

Re: Graziano, *et ano* v. MBLIC Motors LLC, *et ano*
Case No.: 1:25-cv-2943 (NGG) (JRC)
Letter Motion to Adjourn Settlement Conference

Dear Judge Cho:

This firm represents the Defendant MBLIC Motors LLC d/b/a Empire Cadillac (hereinafter the “Defendant” or the “Dealership”) in the above-referenced case. Defendant writes to respectfully request an adjournment of the settlement conference scheduled to proceed on Thursday, February 12, 2026 due to your undersigned’s required appearance at a deposition proceeding in-person in the matter of Superb Motors Inc, *et al.* v. Deo, *et al.*, Case No.: 2:23-cv-6188 (JMW).

Pursuant to ¶ C(2) of this Court’s Individual Practices, Defendant respectfully submits that:

- (i) the date of the settlement conference is February 12, 2026;
- (ii-iii) there have been no prior requests for an adjournment of this settlement conference;
- (iv) Plaintiff does not consent on the grounds that this in-person settlement conference was ordered on January 7, 2026. Review of the docket, respectfully, supports Plaintiff’s position that no additional adjournments should be granted. Defendant respectfully submits in response that its undersigned counsel cannot be in two places at once, and a settlement conference cannot proceed without all parties present since a new Defendant Plaintiff added in this case has not yet appeared.
- (v) The Dealership does not believe this request affects any other scheduled Court appearance or deadline.

Defendant respectfully submits that, in light of this deposition involving multiple parties and the close of discovery currently scheduled to occur on February 28, 2026, good cause exists to permit this Court to exercise its discretion in favor of granting the adjournment sought here. See Fed. R. Civ. P. 6(b)(1)(A). Moreover, Plaintiff’s second amended complaint has joined a new Defendant that has not yet appeared in this case.

Accordingly, the Dealership's motion for an adjournment should be granted. Defendant thanks this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
February 10, 2026

Respectfully submitted,
SAGE LEGAL LLC
By: /s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.
18211 Jamaica Avenue
Jamaica, NY 11423-2327
(718) 412-2421 (office)
(917) 807-7819 (cellular)
(718) 489-4155 (facsimile)
emanuel@sagelegal.nyc

Attorneys for Defendant
MBLIC Motors LLC

VIA ECF

Kasell Law Firm
Attn: David Kasell, Esq.
1038 Jackson Avenue #4
Long Island City, NY 11101
(718) 404-6668 (office)
david@kaselllawfirm.com

Attorneys for Plaintiff
Anthony Graziano